

Daniel A. Sasse (State Bar No. 236234)
 DSasse@crowell.com
 Deborah E. Arbabi (State Bar No. 167275)
 DArbabi@crowell.com
CROWELL & MORING LLP
 3 Park Plaza, 20th Floor
 Irvine, CA 92614-8505
 Telephone: 949.263.8400
 Facsimile: 949.263.8414

*Attorneys for Settlement Class Members
 Cisco Systems, Inc. and Aptiv Services US,
 LLC fka Delphi Automotive LLP*

Joseph R. Saveri
 jsaveri@saverilawfirm.com
 Steven N. Williams
 swilliams@saverilawfirm.com
 Joshua P. Davis
 jdavis@saverilawfirm.com
 James G. Dallal
 jdallal@saverilawfirm.com
 V Prentice
 vprentice@saverilawfirm.com
 Kyle P. Quackenbush
 kquackbush@saverilawfirm.com
 Anupama K. Reddy
 asatyasai@saverilawfirm.com
JOSEPH SAVERI LAW FIRM, INC.
 601 California Street, Suite 1000
 San Francisco, California 94108
 Telephone: (415) 500-6800
 Facsimile: (415) 395-9940

Lead Counsel for Direct Purchaser Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE CAPACITORS ANTITRUST
 LITIGATION**

Master File No. 3:17-md-02801-JD

**THIS DOCUMENT RELATES TO: ALL
 DIRECT PURCHASER ACTIONS**

Case No. 3:14-cv-03264-JD

**JOINT STIPULATION AND
 [PROPOSED] ORDER WITHDRAWING
 OBJECTION**

Hon. James Donato

Courtroom 11, 19th Floor

1 Settlement Class Members, Cisco Systems, Inc. and Aptiv Services US, LLC fka Delphi
 2 Automotive LLP (“Cisco and Aptiv”), and Direct Purchaser Plaintiffs (“DPPs”), by and through
 3 undersigned counsel, stipulate and agree to the below:

4 WHEREAS, Cisco and Aptiv and DPPs have a dispute as to the distribution of the
 5 various settlement funds related to settlements between DPPs and Hitachi and DPPs and Soshin
 6 (“Round 2”) in the above-captioned case, which has been described in the order referring the
 7 dispute to Special Master Jeffrey Bleich (MDL Dkt. No. 521);

8 WHEREAS, Cisco and Aptiv have filed an objection to the proposed settlements
 9 between DPPs and Nichicon and DPPs and Rubycon (the “Round 3 Settlements”) and to DPPs’
 10 Motion for Attorneys’ Fees (MDL Dkt. No. Doc. 522);

11 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the undersigned
 12 counsel for Cisco and Aptiv and DPPs as follows:

13 1. Cisco and Aptiv withdraw their objection to the Round 3 Settlement Agreements,
 14 including their objections to DPPs’ Motion for Attorneys’ Fees.

15 2. Cisco and Aptiv may participate and submit claims for Round 3 Settlements.

16 (a) Round 3 payments and allocations will not be distributed until Round 2 is
 17 fully resolved.

18 3. DPPs withdraw their Notice of Subpoenas for Depositions of Cisco and Aptiv,
 19 served on April 18, 2019.

20 4. The parties jointly request that any dispute that may arise between the DPPs and
 21 Cisco and Aptiv relating to Round 3 settlement distributions shall be referred to Special Master
 22 Bleich pursuant to Judge Donato’s Order Appointing Special Master.

23 5. If the Court does not approve this [proposed] order, Cisco and Aptiv reserve their
 24 rights to file a motion or objection with respect to any Motion for Distribution to be filed in
 25 support of the Round 3 Settlement.

26 6. No consideration has been exchanged between Cisco and Aptiv and DPPs
 27 regarding any of the issues discussed in this Stipulation.
 28

1 **IT IS SO STIPULATED.**

2
3 Dated: April 26, 2019

CROWELL & MORING LLP

4
5 By: /s/ Daniel A. Sasse

6 Daniel A. Sasse

7 *Attorneys for Settlement Class Members*
8 *Cisco Systems, Inc. and Aptiv Services US,*
9 *LLC fka Delphi Automotive LLP*

10 Dated: April 26, 2019

JOSEPH SAVERI LAW FIRM, INC.

11 By: /s/ Steven N. Williams

12
13 Joseph R. Saveri
jsaveri@saverilawfirm.com
14 Steven N. Williams
swilliams@saverilawfirm.com
15 Joshua P. Davis
jdavis@saverilawfirm.com
16 James G. Dallal
jdallal@saverilawfirm.com
17 V Prentice
vprentice@saverilawfirm.com
18 Kyle P. Quackenbush
kquackbush@saverilawfirm.com
19 Anupama K. Reddy
asatyasai@saverilawfirm.com
20 JOSEPH SAVERI LAW FIRM, INC.
601 California Street, Suite 1000
21 San Francisco, California 94108
Telephone: (415) 500-6800
22 Facsimile: (415) 395-9940

23 *Lead Counsel for Direct Purchaser Class*

ECF ATTESTATION

I, Daniel A. Sasse, am the ECF User whose ID and Password are being used to file
JOINT STIPULATION OF WITHDRAWAL AND [PROPOSED] ORDER.

In compliance with Civil Local Rule 5-1, I hereby attest that counsel for Direct Purchaser
Plaintiffs have concurred in this filing.

Dated: April 26, 2019

CROWELL & MORING LLP

By: /s/ Daniel A. Sasse

Daniel A. Sasse

*Attorneys for Settlement Class Members
Cisco Systems, Inc. and Aptiv Services US,
LLC fka Delphi Automotive LLP*

[PROPOSED] ORDER

Pursuant to Settlement Class Members, Cisco Systems, Inc. and Aptiv Services US, LLC fka Delphi Automotive LLP (“Cisco and Aptiv”), and Direct Purchaser Plaintiffs’ (“DPPs”) Joint Stipulation of Withdrawal, and for good cause shown:

1. Cisco and Aptiv withdraw their objections to the Round 3 Settlement Agreements, including their objections to DPPs’ Motion for Attorneys’ Fees.

2. Cisco and Aptiv may participate and submit claims for Round 3 Settlements.

(a) Round 3 payments and allocations will not be distributed until Round 2 is fully resolved.

3. DPPs withdraw their Notice of Subpoenas for Depositions of Cisco and Aptiv, served on April 18, 2019.

4. Any dispute that may arise between Cisco and Aptiv and DPPs relating to Round 3 Settlement distributions shall be referred to Special Master Bleich pursuant to the Court’s Order Appointing Special Master (MDL Dkt. No. 521).

IT IS SO ORDERED.

Dated:

By:

HON. JAMES DONATO
United States District Judge